

EXHIBIT 59

**UNREDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Charles K. Verhoeven (Cal. Bar No. 170151)
2 charlesverhoeven@quinnemanuel.com
David Perlson (Cal. Bar No. 209502)
3 davidperlson@quinnemanuel.com
Melissa J. Baily (Cal. Bar No. 237649)
4 melissabaily@quinnemanuel.com
John Neukom (Cal. Bar No. 275887)
5 johnneukom@quinnemanuel.com
Jordan R. Jaffe (Cal. Bar No. 254886)
6 jordanjaffe@quinnemanuel.com
50 California Street, 22nd Floor
7 San Francisco, California 94111-4788
(415) 875-6600
8 (415) 875-6700 facsimile

9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO UBER'S
INTERROGATORY NOS. 51-56**

SPECIFIC OBJECTIONS AND RESPONSES

Waymo expressly incorporates the above objections as though set forth fully in response to each of the following individual interrogatories, and, to the extent that they are not raised in the particular response, Waymo does not waive those objections.

INTERROGATORY NO. 51:

Identify any Waymo or Google employee who [REDACTED]

RESPONSE TO INTERROGATORY NO. 51:

Waymo objects to this interrogatory on the grounds that it is vague and ambiguous, including with respect to the phrases [REDACTED]

[REDACTED] Waymo further objects to this interrogatory to the extent that it is unduly burdensome, oppressive, overly broad, and not proportional to the needs of the case. Waymo further objects to this interrogatory to the extent that it seeks information that is confidential or protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Waymo further objects to this interrogatory on the grounds that it seeks information that is not relevant to the parties' claims and defenses. Waymo further objects to this request to the extent that it seeks information beyond the scope of the limited discovery of Waymo ordered by the Court, in particular, the Court's requirement that Defendants "take the 30(b)(6) [deposition of Waymo] first," before propounding any other discovery requests. (Dkt. 2342 [12/4 Hr'g. Tr.], at 61:7-17.)

INTERROGATORY NO. 52:

Identify, by Bates range, any Google Talk or Google Hangouts messages produced in this case for Waymo or Google employees.

1 the limited discovery of Waymo ordered by the Court, in particular, the Court’s requirement that
2 Defendants “take the 30(b)(6) [deposition of Waymo] first,” before propounding any other
3 discovery requests. (Dkt. 2342 [12/4 Hr’g. Tr.], at 61:7-17.)
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6 DATED: December 19, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
7 LLP

8 By /s/ Charles K. Verhoeven

9 Charles K. Verhoeven

Attorneys for WAYMO LLC
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